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2 District of Nevada
Nevada Bar No. 13644
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DAWN A. WOLGAST)

11 Plaintiff,)

12 v.)

13 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,)

14 Defendant.)
15)

Case No.: 2:18-cv-02200-MMD-PAL

UNOPPOSED MOTION FOR EXTENSION
OF TIME (FIRST REQUEST)

16
17 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant")
18 respectfully requests that the Court extend the time for Defendant to file her response to Plaintiff's
19 Complaint, due on January 25, 2019 by 31 days, through and including February 25, 2019.

20 Defendant respectfully requests this additional time because additional time is needed to
21 determine whether this action is duplicative of Plaintiff's other action 2:18-cv-01840-APG-GWP,
22 and, if not, to prepare the administrative record. This request is made in good faith with no intention
23 to unduly delay the proceedings.
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1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
2 motion, on January 24, 2019.
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4 Dated: January 25, 2019
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7 Respectfully submitted

8 NICHOLAS A. TRUTANICH
9 United States Attorney

10 /s/ Marcelo Illarmo
11 MARCELO ILLARMO
12 Special Assistant United States Attorney

13 IT IS SO ORDERED:

14 
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: January 25, 2019
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1 **CERTIFICATE OF SERVICE**

2 I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the
3 foregoing document on the date, and via the method of service, identified below:

4 **CM/ECF:**

5 Cyrus Safa - cyrus.safa@rohlflinglaw.com

6 Gerald Welt - gmwesq@weltlaw.com

7
8 Dated January 25, 2019

9 /s/ Marcelo Illarmo
10 **MARCELO ILLARMO**
11 Special Assistant United States Attorney
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